

James B. Wright Senior Attorney

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ENERGY AND GROWET ANY October 13, 2000

Mr. K. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: Docket No. 00-00544, Generic Docket to establish UNE prices for line sharing per FCC 99-355, and riser cable and terminating wire as ordered in TRA docket 98-00123.

Dear Mr. Waddell:

Enclosed for filing in the above case are an original and thirteen copies of Sprint Communications Company L.P.'s First Set of Discovery to BellSouth Telecommunications, Inc. Copies are being served on counsel of record.

Please contact me if you have any questions.

Very truly yours,

James B. Wright

Enclosure

cc: Dennis Wagner

Laura Sykora Kaye Odum Steve Parrott

Lynn Greer, Hearing Officer

Parties of Record (with enclosure)



BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

Generic Docket to establish UNE prices for lines sharing per FCC 99-355 and riser cable and terminating wire as ordered in TRA Docket 98-00123

DOCKET NO. 00-00544

FIRST SET OF DISCOVERY REQUESTS OF SPRINT COMMUNICATIONS COMPANY L.P. TO BELLSOUTH

Comes now Sprint Communications Company L. P. ("Sprint") and propounds this First Set of Discovery Requests to BellSouth Telecommunications, Inc. ("BellSouth")

Please respond to the following interrogatories and requests for data in accordance with the discovery schedule established in this case. Please advise undersigned counsel in writing not later than three days before the due date if you anticipate any problems in responding to any of the interrogatories or data requests.

DEFINITIONS

- 1. "You" means BellSouth and any of its employees, representatives, subsidiaries, affiliates or agents.
- 2. "Document" shall have the broadest possible meaning under applicable law. Document means every writing or record of every type and description that is in your possession, custody or control.

INSTRUCTIONS

In the event the information is not available in the specific format requested, either in part or in total, please provide the information requested in the format maintained in the ordinary course of business.

If you assert that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

If any information requested can not be responded to in full, answer to the extent possible and specify the reason for your inability to respond fully, and when applicable, state where and how the information may be obtained or extracted and the person to be contacted.

All interrogatories and requests for data are continuing in nature and require supplemental responses should information later become known.

INTERROGATORIES

- 1. Does BellSouth allow for the line splitter to be directly wired from the splitter to the CLEC collocation area? If not, please explain why?
- 2. Reference page 001721, Line 28, of BellSouth's Supplemental cost study filed October 2, 2000 ("Cost Study"). Please explain why 4 connecting blocks are required?
- 3. Provide the manufacturer and product number for the Distribution Frame on line 10 on page 001721 of the Cost Study.
- 4. Provide the manufacturer and product number for the Line Sharing splitter bay on line 36 on page 001721of the Cost Study.
- 5. Explain how the system capacity for the line sharing splitter bay of 8 (Page 001721, line 40 of the Cost Study) was determined?

6. Reference page 001721, line 48 of the Cost Study. What investment items are recovered with the input for Line Sharing Splitter (Shelf, Test Equip, Plugins & Cabling)?

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1. On page 001721, line 48 of the Cost Study, please provide the cost study that relates to the input for Line Sharing Splitter (Shelf, Test Equip, Plug-ins & Cabling).
- 2. Reference the Affidavit of Jerry Hendrix filed by BellSouth in this case on August 18, 2000 and Exhibit JH-1 attached thereto. On page 3 of 6 of Exhibit JH-1, source footnote 4 (as defined on page 6 of 6) references "Cost results filed on August 18, 2000 with the Florida Public Service Commission in Docket No. 99649-TP" as the source of several rates ("Florida Docket"). Please provide the following information as it relates to the Florida Docket:
- a) Please provide the cost study referenced in the Florida Docket including all inputs, cost factors, models and all other information used to develop the rates.
- b) Please provide the questions and answers to all discovery issued to BellSouth in the Florida Docket regarding the cost study produced in response to item 2. a).
- c) Please provide any commission orders or decisions issued in the Florida Docket regarding the cost study produced in response to item 2. a).
- d) If hearings in the Florida Docket have been completed, please provide the transcript from the hearings regarding the cost study produced in response to item 2.a).
- e) Please provide any direct, rebuttal, surrebuttal, supplemental and any other type of testimony filed by BellSouth in the Florida Docket regarding the cost study produced in response to item 2. a).

Submitted this 13th day of October, 2000.

James B. Wright, Senior Attorney

Sprint Communications Company L.P.

14111 Capital Boulevard

Wake Forest, North Carolina 27587-5900

CERTIFICATE OF SERVICE Line Sharing UNE (Docket No. 00-00544)

The undersigned certifies that on October 13, 2000, the foregoing discovery of Sprint Communications Company L.P. was served upon the following parties of record by fax or by placing a copy of the same in the United States Mail postage prepaid and addressed as follows:

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